

## **REMARKS**

### **Amendments**

#### ***Amendments to the Claims***

Applicant has amended the independent claims to claim setting a color value of an edge pixel of a mask image to a color value of one of a plurality of neighboring pixel groups in a demosaiced raw image, the one neighboring pixel group having an average brightness value closest to a brightness value of the edge pixel. No new matter has been added because support for the amendments can be found, *intra alia*, in Figures 7 and p. 15, line 7 – p. 16, line 2 of Applicant's specification as originally filed.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 103***

##### **Claims 1-16, 18, and 19**

Claims 1-16, 18, and 19 stand rejected under 35 U.S.C. § 103(a) as being obvious over Acharya, U.S. Patent No. 6,108,453, Kamei et al., U.S. Patent 5,528,698, and Cheatle et al., U.S. Patent Application No. 2004/0258327 (all previously cited). Applicant respectfully submits that the combination of Acharya, Kamei and Cheatle does not teach or suggest each and every limitation of Applicant's invention as claimed in claims 1-16, 18, and 19.

Acharya discloses enhancing a raw image by combining an enhanced map of the image with an approximated version of the image. The enhanced map is generated by applying noise reduction to the difference between the raw and approximated images. The resulting enhanced image that is the pixel-by-pixel sum of intensity values of the enhanced map and approximated image.

Kamei discloses processing a grayscale image by applying intensity mapping functions to the raw grayscale image to obtain image edge information.

Cheatle discloses an image capture system that transforms a set of image tiles to a corrected composite image. The system computes the image intensity for each pixel of the new corrected image by using bi-linear interpolation of the pixels from the image tiles.

In independent claims 1, 6, 11, and 16, Applicant claims setting a color value of an edge pixel of a mask image to a color value of one of a plurality of neighboring pixel groups in a demosaiced raw image, the one neighboring pixel group having an average brightness value closest to a brightness value of the edge pixel. Although Acharya discloses an enhancement map, Acharya does not teach or suggest setting the edge color values of the enhancement map based on the brightness values of neighboring pixels of any of Acharya's disclosed images. Thus, Acharya cannot not teach or suggest setting a color value of an edge pixel of a mask image to a color value of a group of neighboring pixels in a demosaiced raw image whose average brightness value is close to a brightness value of the edge pixel as claimed.

Furthermore, because Kamei is directed to greyscale images and Cheatle does not disclose color images, neither Kamei nor Cheatle can be properly interpreted as teaching or suggesting setting a color value of an edge pixel as claimed.

Accordingly, the combination of Acharya, Kamei, and Cheatle cannot render obvious Applicant's claims 1, 6, 11, and 16 and claims 2-5, 7-10, 12-16, 18, and 19 that depend from them. Accordingly, Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

### **Claims 17 and 20**

Claims 17 and 20 stand rejected under 35 U.S.C. § 103(a) as being obvious over Acharya, Kamei, Cheatle, and Lathrop et al. US Patent No. 6,288,743 (previously cited). Applicant respectfully submits that the combination of Acharya and Lathrop does not teach or suggest each and every limitation of Applicant's invention as claimed in claims 17 and 20.

Lathrop discloses an electronic still camera that processes raw captured images into finished files. The raw captured image is initially processed by a demosaicing step to generate a full color image (referred to in Lathrop as a "color filter array interpolation"). The image is subsequently subjected to edge enhancements before being stored in the camera's nonvolatile memory.

Claims 17 and 20 depend from independent claim 16. In independent claim 16, Applicant claims setting a color value of an edge pixel of a mask image to a color value

of one of a plurality of neighboring pixel groups in a demosaiced raw image, the one neighboring pixel group having an average brightness value closest to a brightness value of the edge pixel. As per above, none of Acharya, Kamei, or Cheatle teach or suggest this claim limitation. Furthermore, Lathrop is directed towards demosaicing a raw image to produce a full color image, and does not teach or suggest setting the color value of an edge pixel of a mask image as claimed. Therefore, the combination cannot render obvious Applicant's invention as claimed in claim 16 and claims 17 and 20 that depend on them. Accordingly, Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

### **New Claims**

New claims 21-32 have been added that depend from independent claims 1, 6, 11, and 16. Applicant respectfully submits that claims 21-32 are allowable for at least the reasons set forth above for claims 1, 6, 11, and 16. Furthermore, Applicant respectfully submits that no new matter has been added because support for claims 21-32 can be found, *intra alia*, in Figure 7 and p. 14, line 3 – p. 15, line 6 of the specification as originally filed.

### **SUMMARY**

Claims 1-32 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Eric Replogle at (408) 720-8300 x7514.

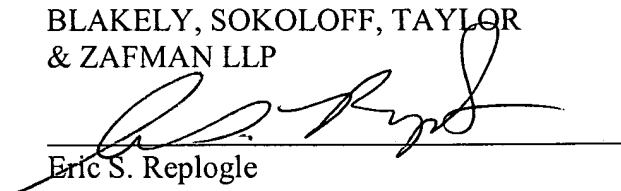
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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& ZAFMAN LLP

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